

Baker & Hostetler LLP

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Presentment Date: February 28, 2019
Time: 10:00 AM

Objections Due: February 25, 2019
Time: 12:00 PM

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

DEFENDANTS IN ADVERSARY PROCEEDINGS
LISTED ON EXHIBIT A ATTACHED HERETO,

Defendants.

Adv. Pro. Nos. listed on Exhibit A
Attached Hereto

**NOTICE OF PRESENTMENT OF ORDERS MODIFYING
ORDERS AUTHORIZING THE DEPOSITIONS OF
ANNETTE BONGIORNO, DANIEL BONVENTRE, & JOANN CRUPI**

PLEASE TAKE NOTICE that Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated chapter 7 estate of Bernard L. Madoff, by the Trustee’s undersigned counsel, will present the proposed orders (the “Proposed Orders”), attached as **Exhibits B–D**, to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature on **February 28, 2019 at 10:00 AM**:

- 1) **Exhibit B**, modifying the Order Authorizing the Deposition of Federal Prisoner Annette Bongiorno (ECF No. 18321), a copy of which is annexed hereto as **Exhibit E**;
- 2) **Exhibit C**, modifying the Order Authorizing the Deposition of Federal Prisoner Daniel Bonventre (ECF No. 18322), a copy of which is annexed hereto as **Exhibit F**; and
- 3) **Exhibit D**, modifying the Order Authorizing the Deposition of Federal Prisoner Joann Crupi (ECF No. 18323), a copy of which is annexed hereto as **Exhibit G**.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Proposed Orders (“Objections”), shall: (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the Objection(s) and the specific grounds therefore; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service, and a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein, One Bowling Green, New York, New York 10004; and (v) be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington,

DC 20006-1620, Attn: Kevin H. Bell, Esq.; so as to be received no later than **12:00 PM on February 25, 2019.**

PLEASE TAKE FURTHER NOTICE, that if an Objection is timely served and filed, a hearing may be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge on a date to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE, that unless Objections are timely served and filed, the Proposed Orders may be signed without a hearing.

Dated: New York, New York
February 20, 2019

Respectfully Submitted,
/s/ David J. Sheehan
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and the Chapter 7 Estate of Bernard L. Madoff*